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June 13, 2017

VIA EMAIL (mccarthy@nywd.uscourts.gov)

Hon. Jeremiah J. McCarthy  
United States Magistrate Judge  
Robert H. Jackson United States Courthouse  
2 Niagara Square  
Buffalo, NY 14202

Re: *David Michaels v. Agros Trading Confectionery Spółka Akcyjna*  
Civil Action No.: 1:16-cv-01015-LJV-JJM

Dear Judge McCarthy:

The parties have agreed to an early mediation of the above-referenced action, and request a Mediation Completion Date of August 11, 2017.

If the mediation is unsuccessful, the parties request the following revised briefing schedule for the pending motions:

Deadline for filing Plaintiff's motion to dismiss counterclaims and response to defendant's motion for a preliminary injunction: August 24, 2017;

Defendant's response to motion to dismiss and reply brief in support of preliminary injunction: September 7, 2017;

Plaintiff's reply in support of Motion to Dismiss: September 14, 2017; and

Oral Arguments for both motions: September 21, 2017, or at the earliest date convenient to the court.

Thank you for your consideration of the above request.



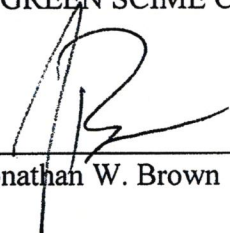


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June 13, 2017  
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Respectfully submitted,

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